

621254J

Marc S. Dreier (MD-9713)  
 Joel A. Chernov (JC-8789)  
 Regina M. Alter (RA-7014)  
 DREIER LLP  
 499 Park Avenue  
 New York, New York 10022  
 (212) 328-6100

*Attorneys for Plaintiffs*

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #:  
 DATE FILED: 4/22/08

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X  
 Allan Applestein TTEE FBO D.C.A. :  
 Grantor Trust, *et al.*, :

Plaintiff, :

v. :

The Republic of Argentina, :

Defendant. :

-----X  
 Etevob, *et al.*, :

Plaintiffs, :

v. :

The Republic of Argentina and  
 The Province of Buenos Aires, :

Defendants. :

-----X  
 Franceschi, *et al.*, :

Plaintiffs, :

v. :

The Republic of Argentina, :

Defendant. :  
 -----X

No. 02 Civ. 4124 (TPG)

**ORDER TO SHOW CAUSE**

No. 03 Civ. 1680 (TPG)

No. 03 Civ. 4693 (TPG)

-----X		
Mazzini, <i>et al.</i> ,	:	No. 03 Civ. 8120 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Prima, <i>et al.</i> ,	:	No. 04 Civ. 1077 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina and	:	
The Province of Buenos Aires,	:	
	:	
Defendants.	:	
-----X		
Mazoral, S.A.,	:	No. 04 Civ. 3313 (TPG)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Morata, <i>et al.</i> ,	:	No. 04 Civ. 3314 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		

-----X		
Moldes, <i>et al.</i> ,	:	No. 04 Civ. 6137 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina and	:	
The Province of Buenos Aires,	:	
	:	
Defendants.	:	
-----X		
Cilli, <i>et al.</i> ,	:	No. 04 Civ. 6594 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Buczat, <i>et al.</i> ,	:	No. 04 Civ. 7056 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Rosa, <i>et al.</i> ,	:	No. 04 Civ. 7504 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		

-----X		
Consolini, <i>et al.</i> ,	:	No. 05 Civ. 177 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Legnaro, <i>et al.</i> ,	:	No. 05 Civ. 178 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina and	:	
The Province of Buenos Aires,	:	
	:	
Defendants.	:	
-----X		
Martinez, <i>et al.</i> ,	:	No. 05 Civ. 2521 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Ferri, <i>et al.</i> ,	:	No. 05 Civ. 2943 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		

-----X	
Rigueiro, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Sauco, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Bettoni, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Fedecostante, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	

No. 05 Civ. 3089 (TPG)

No. 05 Civ. 3955 (TPG)

No. 05 Civ. 4299 (TPG)

No. 05 Civ. 4466 (TPG)

-----X	
Lisi, <i>et al.</i> ,	: No. 05 Civ. 6002 (TPG)
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Denchu Investment Corporation,	: No. 03 Civ. 9538 (TPG)
	:
Plaintiff,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Rossini, <i>et al.</i> ,	: No. 05 Civ. 6200 (TPG)
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina and	:
The Province of Buenos Aires,	:
	:
Defendants .	:
-----X	
Klein, <i>et al.</i> ,	: No. 05 Civ. 6599 (TPG)
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	

-----X	
Sergio Lovati,	:
	:
Plaintiff,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Botti, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina and	:
The Province of Buenos Aires,	:
	:
Defendants.	:
-----X	
Pasquali, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Bolland, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	

No. 05 Civ. 8159 (TPG)

No. 05 Civ. 8687 (TPG)

No. 05 Civ. 10636 (TPG)

No. 06 Civ. 3196 (TPG)

-----X	
Amoroso, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Bliway International S.A.,	:
	:
Plaintiff,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Schwald, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	
Ivelo Holding Corporation,	:
	:
Plaintiff,	:
	:
v.	:
	:
The Republic of Argentina,	:
	:
Defendant.	:
-----X	

No. 06 Civ. 3197 (TPG)

No. 06 Civ. 3198 (TPG)

No. 06 Civ. 6032 (TPG)

No. 06 Civ. 7100 (TPG)



-----X	:	
Ebrahim Tadayon,	:	No. 06 Civ. 14299 (TPG)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X	:	

-----X	:	
Beyer, <i>et al.</i> ,	:	No. 07 Civ. 98 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X	:	

-----X	:	
Palladini, <i>et al.</i> ,	:	No. 07 Civ. 689 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X	:	

-----X	:	
Catto, <i>et al.</i> ,	:	No. 05 Civ. 937 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X	:	

-----X		
Dolcetti, <i>et al.</i> ,	:	No. 07 Civ. 2607 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Baccanelli,	:	No. 07 Civ. 3851 (TPG)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Baccanelli,	:	No. 07 Civ. 2788 (TPG)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Borga, <i>et al.</i> ,	:	No. 07 Civ. 5807 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		

-----X		
Milanesi, <i>et al.</i> ,	:	No. 07 Civ. 7248 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Heeb, <i>et al.</i> ,	:	No. 07 Civ. 10656 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
HWB Victoria Strategies Portfolio, <i>et al.</i> ,	:	No. 07 Civ. 11382 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		
Erb, <i>et al.</i> ,	:	No. 07 Civ. 11495 (TPG)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
The Republic of Argentina,	:	
	:	
Defendant.	:	
-----X		

-----X  
Zylberberg Fein LLC, : No. 07 Civ. 11496 (TPG)  
: :  
Plaintiffs, : :  
: :  
v. : :  
: :  
The Republic of Argentina, : :  
: :  
Defendant. : :  
-----X

Vaduz, *et al.*, : No. 07 Civ. 11497 (TPG)  
: :  
Plaintiffs, : :  
: :  
v. : :  
: :  
The Republic of Argentina, : :  
: :  
Defendant. : :  
-----X

Amber Reed Corp., *et al.*, : No. 08 Civ. 440 (TPG)  
: :  
Plaintiffs, : :  
: :  
v. : :  
: :  
The Republic of Argentina, : :  
: :  
Defendant. : :  
-----X

**UPON READING AND FILING** of the accompanying Declaration of Regina M. Alter, sworn to on April 22, 2008, with the exhibits annexed thereto, and upon all of the papers, pleadings, oral argument and all prior proceedings in the above-captioned actions,

**LET THE DEFENDANT HEREIN SHOW CAUSE**, before Judge Thomas P. Griesa Room 26B, at the United States Courthouse located at 500 Pear Street, New York, on the 30<sup>th</sup> day of April, 2008 at 10:30 am, or as soon thereafter as counsel may be heard, why an order should not be made and entered:

(a) Subject to (b) below, preliminarily restraining and enjoining pursuant to Fed.. R. Civ. P. 64 and 65(a), Defendant The republic of Argentina ("Argentina"), its servants, employees, agents, representatives and any person acting in concert with them (including, without limitation, Caja de Valores Sociedad Anonima ("CV")) from issuing ay instruction to CV, or to any other person, to transfer, sell, pledge, loan or otherwise encumber or alienate any Trust Bond (as defined in the Declaration Guillermo A. Gleizer, dated April 18, 2008, a true and correct copy of which without exhibits is annexed to the accompanying Declaration of Regina M. Alter, sworn to on April 22, 2008, as Exhibit B) held by CV in the Depository Trust Company ("DTC") in New York;

(b) Requiring Argentina to instruct CV, or any other person, to cause the deposit of the Trust Bonds in to an account to be designated by this Court for plaintiffs' benefit;

(c) Preliminarily restraining and enjoining, pursuant to Fed. R. Civ. P. 64 and 65(a), Argentina its servants, employees, agents, representatives and any person acting in concert with them, from issuing any notices or instructions to the Fiscal Agent for the Global Bonds;

(d) Requiring expedited Discovery from Argentina, CV, and any other necessary

person, to the extent necessary to implement the transfer of the Trust Bonds for plaintiffs' benefit; and

(e) for such other and further relief as this Court may deem just, proper and necessary under the circumstances.

**SUFFICIENT CAUSE BEING ALLEGED THEREFORE, IT IS HEREBY:**

**ORDERED** that pending hearing and determination of this application, Argentina, its servants, employees, agents, representatives and any person acting in concert with them (including, without limitation, CV) are restrained and enjoined, pursuant to Fed. R. Civ. P. 65(b), from issuing any instructions to CV, or to any other person, to transfer, sell, pledge, loan or otherwise encumber or alienate the trust Bonds held by CV at DTC;

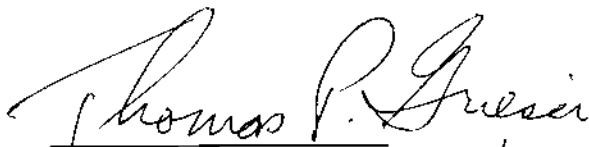
**IT IS FURTHER ORDERED** that pending the hearing and determination of this application, Argentina, its servants, employees, agents, representatives and any person acting in concert with them, are restrained and enjoined, pursuant to Fed. R. Civ. P. 65(b), from issuing any notices or instructions to the Fiscal Agent for the Global Bonds;

**IT IS FURTHER ORDERED** that personal service of this Order to Show Cause, and the papers upon which it is based, upon counsel for Argentina, Cleary, Gottlieb, Steen & Hamilton, One Liberty Plaza, New York 10006, attention Jonathan Blackman, Esq., on or before the <sup>23rd</sup>~~29th~~ day of April, 2008, shall be deemed good and sufficient service;

**IT IS FURTHER ORDERED** that opposing papers, if any, are to be served upon counsel for plaintiffs' Dreier LLP, 499 Park Avenue, New York, NY 10036, attention Joel A. Chernov, Esq., so as to be received by <sup>10:30 AM</sup>~~12:00 noon~~ on the <sup>30th</sup>~~29th~~ day of April, 2008;

**AND IT FURTHER ORDERED** that reply papers, if any shall be served upon Defendant's counsel, so as to be receive not later than the hearing.

ENTERED:

  
Hon. Thomas P. Griesa 4/22/08  
United States District Court  
Southern District of New York

